

Certificate of Notice Page 1 of 4
United States Bankruptcy Court
Eastern District of Pennsylvania

In re:
Traci Michelle Green
Debtor

Case No. 19-13014-jkf
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0313-2

User: ChrissyW
Form ID: pdf900

Page 1 of 1
Total Noticed: 1

Date Rcvd: May 14, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 16, 2020.

db +Traci Michelle Green, 7973 Temple Road, Philadelphia, PA 19150-2115

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 16, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 14, 2020 at the address(es) listed below:

BRIAN E. CAINE on behalf of Creditor Gateway Mortgage Group, a division of Gateway First Bank
bcaine@parkermccay.com, BKcourtnotices@parkermccay.com
KEVIN G. MCDONALD on behalf of Creditor Gateway Mortgage Group, a division of Gateway First
Bank bkgroup@kmlawgroup.com
MICHAEL D. SAYLES on behalf of Debtor Traci Michelle Green midusal@comcast.net,
michaeldsaylesesq@comcast.net;r43253@notify.bestcase.com
REBECCA ANN SOLARZ on behalf of Creditor Gateway Mortgage Group, a division of Gateway First
Bank bkgroup@kmlawgroup.com
SCOTT F. WATERMAN (Chapter 13) ECFMail@ReadingCh13.com
SCOTT F. WATERMAN (Chapter 13) on behalf of Trustee SCOTT F. WATERMAN (Chapter 13)
ECFMail@ReadingCh13.com
United States Trustee USTPRegion03.PH.ECF@usdoj.gov

TOTAL: 7

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

In Re:	:	
	:	Chapter 13
Traci Michelle Green	:	Case No. 19-13014-JKF
Debtor,	:	
-----	:	
Gateway Mortgage Group, a division	:	
of Gateway First Bank	:	
	:	
Movant,	:	
v.	:	Hearing: May 12, 2020 at 9:30 a.m.
	:	Courtroom # 3
Traci Michelle Green	:	
Debtor,	:	
and	:	
	:	
Scott F. Waterman, Esquire	:	11 U.S.C. §362(d) and §1301
Trustee,	:	
	:	
Respondents.	:	
-----	:	

**STIPULATION RESOLVING MOTION FOR RELIEF
FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY**

THIS matter being opened to the Court by Brian E. Caine, Esquire, of the law office of Parker McCay P.A., attorney for the secured creditor, Gateway Mortgage Group, a division of Gateway First Bank, (hereinafter “Movant”), upon a Motion for Relief from the Automatic Stay and Co-Debtor Stay as to Real Property, more commonly known as 7973 Temple Road, Philadelphia, PA 19150; and Michael D. Sayles, Esquire appearing on behalf of Debtor, Traci Michelle Green, and it appearing that the parties have amicably resolved their differences and for good cause shown;

1. As of May 4, 2020, the post-petition arrears are \$6,371.20 – which represents payments of \$1,300.10 each, due January 1, 2020 through May 1, 2020 with a suspense balance of \$129.30.
2. The Debtor agrees to reimburse the Movant for its attorney fees (\$850.00) and costs (\$181.00) for prosecution of the within Motion.

3. The Debtor shall cure the post-petition arrears (6,371.20), plus the motion fees and costs (\$850.00 plus \$181.00) by filing an amended chapter 13 plan which provides for a cure of said funds to Movant in the amount of \$7,402.20 through the plan.
4. The Debtor shall file said amended plan as per paragraph 3 above by May 18, 2020, and if the Debtor fails to timely file said amended plan or confirmation of said amended plan is denied, Movant may file a Certification of Default with the Court and the Court shall enter an Order granting Movant relief from the automatic stay as to the mortgaged property herein.
5. The Debtors will resume regular monthly payments to Movant starting with the June 1, 2020 payment, and continuing each month thereafter for the duration of this Chapter 13 proceeding, Debtor shall remit payments directly to Movant as same come due.
6. The Debtor will stay current with plan payments to the Trustee.
7. If the Debtor fails to stay current with direct mortgage payments to the Movant (as they become due), or fail to stay current with plan payments (30 day default on plan payments), then counsel for the Movant may send Debtors and Debtors' attorney a notice of default, and the Debtors shall have 14 days to cure said default. If the default is not cured timely cured, Movant may file a Certification of Default with the Court and the Court shall enter an Order granting Movant relief from the automatic stay as to the mortgaged property herein.
8. Movant shall amend the claim by May 18, 2020 to incorporate the post-petition arrears of \$6,371.20, plus the motion fees and costs (\$850.00 plus \$181.00), which are going to be provided for in the plan.

(remainder of page intentionally left blank)

The undersigned hereby consent to the form and entry of the within Stipulation.

/s/Brian E. Caine

Brian E. Caine, Esquire
Parker McCay P.A.
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Mount Laurel, NJ 08054
(856) 985-4059
bcaine@parkermccay.com

Michael D. Sayles, Esquire

Michael D. Sayles, Esquire
Sayles and Associates
427 West Cheltenham Avenue, Suite #2
Elkins Park, PA 19027-3201
(215) 635-2270
midusal@comcast.net

/s/Polly A. Langdon

Concurrence by the Chapter 13 Trustee

It is hereby **ORDERED**, that the foregoing Stipulation is approved, shall be, and is made and Order of this Court.

Date: May 14, 2020



JEAN K. FITZSIMON
U.S. BANKRUPTCY JUDGE